

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, *et al.*, individually and on  
behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., *et al.*,

Defendants.

Case No. 1:23-cv-08292 (SHS) (OTW)

JONATHAN ALTER, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI INC., *et al.*,

Defendants.

**NOTICE OF OBJECTION TO DISCOVERY ORDERS AT ECF 290**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all pleadings and proceedings referenced therein, OpenAI Inc., OpenAI OpCo LLC, OpenAI GP LLC, OpenAI LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC (the “OpenAI Defendants”) move this Court, before the Honorable Sidney H. Stein in Courtroom 23A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 72(a) setting aside the discovery order at ECF 290 and directing

Plaintiffs to provide the discovery at issue, and ordering any such other further relief as this Court may deem just and proper.

Dated: December 23, 2024

Respectfully submitted,

By: /s/ Elana Nightingale Dawson

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\*All parties whose electronic signatures are included herein have consented to the filing of this document in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.